

EXHIBIT A

4. “Named Beneficiaries” means one or more of Plaintiff Natasha Wit, Plaintiff Brian Muir, Plaintiff Brandt Pfeifer’s late wife Lauralee Pfeifer, Plaintiff Lori Flanzraich’s daughter Casey Flanzraich, and Plaintiff Cecilia Holdnak’s minor daughter (identified in this action as Emily Holdnak).

5. “Plan” means an employer-sponsored health benefit plan governed by ERISA for which You are responsible for making benefit determinations with respect to mental health or substance abuse related benefit claims.

6. “Plan Term Document” means any Document setting forth the terms of a Plan, including official Plan documents, summary Plan descriptions, administrative services agreements with regard to one or more Plans, certificates of coverage with regard to one or more Plans, and group contracts with regard to one or more Plans.

7. “Benefit Claim” means a claim for insurance coverage, whether prospective or retrospective, for residential treatment with respect to mental health or substance abuse pursuant to a Plan.

8. “Benefit Adjudicator” means an individual responsible, whether individually or as part of a group, for reviewing Benefit Claims and/or determining whether to approve or deny Benefit Claims, whether or not such review and/or determination is final. Benefit Adjudicators include case managers, care advocates, and medical directors.

9. “UBH LOCs” means UBH’s “level of care” guidelines.

10. “UBH CDGs” means UBH’s “coverage determination guidelines.”

11. “UBH LOS Benchmarks” means any document created, adapted, or adopted by You, reflecting the appropriate “length of stay” in, or duration of, a course of residential treatment for mental health or substance abuse conditions.

12. “Other UBH Guidelines” means any guidelines, manuals, procedures, instructions, benchmarks, or other similar information created, adapted, or adopted by You, to assist Benefit Adjudicators in reviewing Benefit Claims, other than UBH LOCs, UBH CDGs, or UBH LOS Benchmarks.

13. “Nationally Recognized Guidelines” means any guidelines, procedures, instructions, or other information created, adapted, or adopted by a nationally recognized mental health or substance abuse treatment organization, including the American Psychiatric Association, the American Academy of Child and Adolescent Psychiatry, the American Association of Community Psychiatrists, and the American Society for Addiction Medicine.

14. “Communication(s)” means any transmission of information from one Person, group, or entity to another including, without limitation, by personal meeting, telephone, facsimile, physical or electronic mail, teleconference, and/or videoconference, for any purpose, whether or not planned, and whether or not the other party responds.

15. “Document(s)” has the same meaning herein as used in Rule 34 of the Federal Rules of Civil Procedure and shall accordingly be construed in its broadest sense to include, without limitation, any writings, drawings, graphs, charts, photographs, models, sound recordings, images, and other data or data compilations whether written, printed, typed, recorded, copied, or otherwise created, and whether stored in tangible, physical, electronic, magnetic, or other form, through (or from) which information is

conveyed or stored. Two or more items described by the preceding sentence that are materially different—for example, have different handwritten notes or highlighting—constitute separate Documents under this definition. Document(s) also include any file, tab, folder, binder, box, cabinet, disk, CD, DVD, or other labels appended to any other Document(s).

16. “And” as well as “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Requests information or Documents which might otherwise be construed to be outside their scope.

17. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.” “Any” shall be construed to include the word “all” and “all” shall be construed to include the word “any.”

18. “Person” means any natural person, corporation, firm, partnership, unincorporated association, trust or other legal, business or governmental entity, and any group or combination thereof.

19. The words “relate” and “regard” (and any variations thereof), with regard to a particular subject, mean anything that constitutes, contains, embodies, evidences, reflects, supports, concerns, identifies, states, refers to, regards, records, deals with, describes, explains, or is in any way pertinent to that subject.

20. The word “include” (and any variations thereof) means including, but not limited to, and does not limit the scope of a request in any way.

21. To the extent not otherwise defined herein, all words shall have their usual and ordinary meaning as the context would indicate or require.

22. As used herein, the singular shall include the plural and the plural shall include the singular whenever necessary to bring within the scope of these Requests information or Documents which might otherwise be outside their scope.

23. As used herein, the masculine shall include the feminine and the feminine shall include the masculine whenever necessary to bring within the scope of these Requests information and Documents which might otherwise be outside their scope.

INSTRUCTIONS

1. Produce all Documents known or available to You, whether such documents are in Your possession, or in the possession of (or otherwise obtainable, by You, from) any person under your control.

2. The fact that a particular request for production provides certain examples of responsive Documents that You must produce does not change the fact that other kinds of responsive Documents exist, which You must also produce in response to that request.

3. Unless otherwise stated in an individual request, produce all responsive materials from January 1, 2009 to the present.

4. You must produce electronically stored information in the manner provided by the proposed Production Format Agreement submitted by Plaintiffs to You on December 8, 2014, or in the manner provided by the final Production Format Agreement once it is fully executed by the parties.

5. Documents withheld from production on the basis of the attorney-client privilege, work product protection or any other privilege shall be logged in accordance with the Case Management Statement filed on November 12, 2014 (ECF No. 59).

6. You must respond fully to each request. To the extent that a full response is not possible, You must respond to the extent possible, explain why a full response is not possible, and explain in detail what Documents responsive to that request have not been produced.

7. You must produce Documents not otherwise responsive to a request if they are attached to, enclosed with, or electronically forwarded with any Document that is responsive.

8. Each Request shall be deemed continuing so as to require supplemental responses if You obtain or discover additional Documents after the date of Your initial production.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All Plan Term Documents.
2. All Documents relating to types or categories of Plans, including templates for Plan Term Documents, sample Plan Term Documents, and Documents classifying or grouping Plans and/or Plan Term Documents based on shared characteristics.
3. All UBH LOCs.
4. All UBH CDGs.
5. All UBH LOS Benchmarks.
6. All Other UBH Guidelines.
7. All Communications to or from a Benefit Adjudicator regarding application of UBH LOCs to Benefit Claims, whether or not such Communications explicitly mention residential treatment.
8. All Communications to or from a Benefit Adjudicator regarding application of UBH CDGs to Benefit Claims, whether or not such Communications explicitly mention residential treatment.
9. All Communications to or from a Benefit Adjudicator regarding application of UBH LOS Benchmarks to Benefit Claims, whether or not such Communications explicitly mention residential treatment.
10. All Communications to or from a Benefit Adjudicator regarding application of Other UBH Guidelines to Benefit Claims, whether or not such Communications explicitly mention residential treatment.

11. All Communications to or from a Benefit Adjudicator regarding application of Nationally Recognized Guidelines to Benefit Claims, whether or not such Communications explicitly mention residential treatment.

12. All Documents related to the training, instruction, or guidance UBH provides to Benefit Adjudicators with respect to handling Benefit Claims.

13. All Documents related to UBH's performance evaluations of Benefit Adjudicators, including any such evaluations, the criteria used for such evaluations, and Communications regarding such evaluations.

14. All Documents related to the compensation, including any bonuses, that UBH provides to Benefit Adjudicators, including the amount of annual compensation, the criteria used to establish compensation, and Communications regarding compensation.

15. All Documents related to Benefit Claims submitted by or on behalf of the Named Beneficiaries.

16. All Documents related to Benefit Claims submitted by or on behalf of someone other than a Named Beneficiary, for which UBH denied coverage.

17. All Documents that You have obtained by issuing subpoenas *duces tecum* to third parties in connection with this case.

18. All Documents provided to, received from, prepared by, or relied upon by any of Your expert witness whom You intend to call this case.

19. All exhibits and any other evidence on which You intend to rely to oppose class certification in this case.

Dated: December 8, 2014

Respectfully submitted,

/s/ Andrew Caridas

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of December, 2014, I caused the foregoing **PLAINTIFFS FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** to be served by electronic mail and First Class Mail upon:

Christopher Flynn (cflynn@crowell.com)
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1001 Pennsylvania Avenue NW
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and by electronic mail upon:

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/s/ Andrew Caridas
Andrew Caridas